

Exhibit D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
JENNIFER ECKHART and CATHY AREU, :
 :
 Plaintiffs, : Civil Case No. 1:20-cv-05593
 :
 against :
 :
 FOX NEWS NETWORK, LLC, ED HENRY, :
 SEAN HANNITY, TUCKER CARLSON and :
 HOWARD KURTZ, in their individual and :
 professional capacities, :
 :
 Defendants. :
----- X

**DEFENDANTS FOX NEWS NETWORK, LLC, SEAN HANNITY, TUCKER
CARLSON, AND HOWARD KURTZ’S RULE 11 MOTION FOR SANCTIONS.**

August 11, 2020

Anthony J. Dick
Ariel N. Volpe
JONES DAY
51 Louisiana Ave., NW
Washington, DC 20001
Tel. (202) 879-3939
E-mail: ajdick@jonesday.com

Kathleen M. McKenna, Esq.
Lloyd B. Chinn, Esq.
Keisha-Ann G. Gray, Esq.
Danielle J. Moss, Esq.
Yonatan L. Grossman-Boder
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036-8299
Tel. (212) 969-3000
Fax. (212) 969-2900
E-mail: KMckenna@proskauer.com

*Attorneys for Defendants Fox News Network, LLC, Sean Hannity,
Tucker Carlson, and Howard Kurtz*

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Affidavits and Exhibits annexed thereto, Defendants move the United States District Court for the Southern District of New York (located in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York) for an order imposing sanctions on Plaintiff Catherine Areu and her attorney under Federal Rule of Civil Procedure 11(c).

Dated: August , 2020

By: _____

Kathleen M. McKenna, Esq.
Lloyd B. Chinn, Esq.
Keisha-Ann G. Gray, Esq.
Danielle J. Moss, Esq.
Yonatan L. Grossman-Boder
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036-8299
(212) 969-3000
kmckenna@proskauer.com

Anthony J. Dick
Ariel N. Volpe
JONES DAY
51 Louisiana Ave., NW
Washington, DC 20001
Tel. (202) 879-3939
Fax. (202) 879-1700
E-mail: ajdick@jonesday.com

*Attorneys for Defendants
Fox News Network, LLC, Sean Hannity,
Tucker Carlson, and Howard Kurtz*